

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
GREENEVILLE DIVISION**

| | | |
|--|---|---------------------------|
| B.P., H.A., and S.H., individually, and on |) | |
| behalf of all others similarly situated, |) | |
| |) | |
| Plaintiffs, |) | No: 2:23-cv-00071-TRM-JEM |
| v. |) | |
| |) | |
| CITY OF JOHNSON CITY, TENNESSEE, |) | |
| a government entity, et al. |) | |
| |) | |
| Defendants. |) | |

**STIPULATION OF EXTENSION OF TIME TO RESPOND TO
SECOND AMENDED CLASS ACTION COMPLAINT
E.D. TN. L. R. 12.1(a)**

Come Plaintiffs, B.P., H.A., and S.H., individually and on behalf of all others similarly situated, and Defendants, Jeff Legault and Brady Higgins, in their individual capacity, hereby appear by and through counsel, pursuant to E.D. TN. L. R. 12.1(a) and in accordance with the Amended Scheduling Order (Doc. 95) entered December 19, 2023, and announce to this Honorable Court that Defendants Jeff Legault and Brady Higgins shall have through the close of business on Monday, April 1, 2024, to respond to the allegations in the Plaintiffs' Second Amended Class Action Complaint, and in accordance with the Amended Scheduling Order, Plaintiffs will have through the close of business on May 1, 2024, to file their response(s) to Defendants' Rule 12 motions.

Respectfully submitted this 27th day of March, 2024.

Respectfully submitted,

s/Keith H. Grant

Keith H. Grant, BPR# 023274

Laura Beth Rufolo, BPR# 015622
Philip Aaron Wells, BPR# 036248
ROBINSON, SMITH & WELLS, PLLC
Suite 700, Republic Centre
633 Chestnut Street
Chattanooga, TN 37450
Telephone: (423) 756-5051
Facsimile: (423) 266-0474

*Attorneys for Justin Jenkins, Jeff Legault and
Brady Higgins, in their individual capacities*

/s/ Heather Moore Collins w/permission

Heather Moore Collins BPR # 026099
Ashley Shoemaker Walter BPR# 037651
HMC CIVIL RIGHTS LAW, PLLC
7000 Executive Center Drive, Suite 320
Brentwood, TN 37027
615-724-1996
615-691-7019 FAX

Attorneys for Plaintiffs

/s/ Vanessa Baehr-Jones w/permission

Vanessa Baehr-Jones CABN # 281715
Pro Hac Vice

Advocates for Survivors of Abuse PC

4200 Park Boulevard No. 413
Oakland, CA 94602
(510) 500-9634

Attorney for Plaintiffs

s/ Elizabeth Kramer w/permission

Julie Erickson (California Bar # 293111)
Elizabeth Kramer (California Bar # 293129)
Kevin Osborne (California Bar #261367)

Pro Hac Vice

Erickson Kramer Osborne LLP
44 Tehama St.

San Francisco, CA 94105

415-635-0631

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was filed electronically on March 27, 2024. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.

This the 27th day of March, 2024.

Robinson, Smith & Wells, PLLC

By: s/ Keith H. Grant

cc: K. Erickson Herrin
HERRIN, MCPEAK & ASSOCIATES
515 East Unaka Avenue
P.O. Box 629
Johnson City, TN 37605-0629
lisa@hbm-lawfirm.com

Emily C. Taylor
WATSON, ROACH, BATSON & LAURDERBACK, P.L.C.
P.O. Box 131
Knoxville, TN 37901-0131
etaylor@watsonroach.com

Jonathan P. Lakey, BPR # 016788
BURCH, PORTER & JOHNSON, PLLC
130 North Court Avenue
Memphis, TN 38103
Phone: (901) 524-5024
Email: jlakey@bpjlaw.com

Attorneys to Defendants, Johnson City, Tennessee, Karl Turner, Captain Kevin Peters
and Investigator Toma Sparks.

Daniel H. Rader III
Daniel H. Rader IV
MOORE, RADER & YORK PC
46 N. Jefferson Avenue
P.O. Box 3347
Cookeville, TN 38502-3347
danrader@moorerader.com
danny@moorerader.com
Counsel for Kevin Peters in his individual capacity

Kristin Ellis Berexa
Ben C. Allen
FARRAR BATES BEREXA
12 Cadillac Drive, Suite 480
Brentwood, TN 37027-5366
kbrexa@fbb.law
ballen@fbb.law
Counsel for Toma Sparks in his individual capacity